

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW MEXICO**

**TABITHA CLAY,**

**Plaintiff,**

**vs.**

**Case No. 1:21-cv-00591-MIS/JHR**

**BOARD OF COUNTY COMMISSIONERS  
FOR RIO ARriba COUNTY, RIO ARriba  
COUNTY SHERIFF'S OFFICE, JAMES D.  
LUJAN, in his official and individual capacities,  
and JEREMY BARNES, in his individual capacity,**

**Defendants.**

**JOINT MOTION FOR STIPULATED CONFIDENTIALITY ORDER**

The Parties, by and through their counsel of record, pursuant to Fed. R. Civ. P. 26(c), move the Court for entry of the Stipulated Protective and Confidentiality Order submitted with this Joint Motion, stating as follows:

1. The parties agree that during the course of discovery that it may be necessary to disclose certain confidential information relating to the subject matter of this action.
2. The parties agree certain categories of such information should be treated as confidential, protected from disclosure outside this litigation, and used only for purposes of prosecuting or defending this action and any appeals or related proceedings involving a party.
3. The parties have agreed to the terms of the proposed Stipulated Protective and Confidentiality Order attached hereto as Exhibit 1.
4. Entry of the proposed Stipulated Protective and Confidentiality Order is necessary in this action to protect privacy interests, to protect confidential information, and to limit disclosure and use of such information and documents to this civil proceeding.

WHEREFORE, the Parties ask the Court to enter the proposed Stipulated Protective and Confidentiality Order.

Respectfully submitted,

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**CERTIFICATE OF SERVICE**

I hereby certify that on this 1st day of February, 2022, a true and correct copy of the foregoing was served electronically via the CM/ECF system to all counsel of record.

/s/ Kate S. Thompson  
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